



# FACILITY COMPLIANCE AUDIT REPORT

## Division of Waste Management Solid Waste Section

### UNIT TYPE:

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		<b>COUNTY: HAYWOOD</b> <b>PERMIT NO.: 44-06</b> <b>FILE TYPE: COMPLIANCE</b>
Closed MSWLF		HHW		White goods		Incin		T&P		FIRM		
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill	<b>X</b>	DEMO		SDTF		

**Date of Audit:** 07/01/09, 09/09/08

**Date of Last Audit:** 07/25/07

### FACILITY NAME AND ADDRESS:

Evergreen Packaging Industrial Landfill  
State Road 1550  
Canton, NC 28716

**GPS COORDINATES:** **N:** 35.548508 **E:** -82.876149

### FACILITY CONTACT NAME AND PHONE NUMBER:

Jim Giaque  
(828) 646-6892

### FACILITY CONTACT ADDRESS:

Jim Giaque  
Evergreen Packaging  
PO Box 4000  
Canton, NC 28716

### AUDIT PARTICIPANTS:

Andrea Keller – NCDENR Solid Waste Section  
Jim Giaque – Evergreen Packaging/Blue Ridge  
Paper Products Inc.

### STATUS OF PERMIT:

Active  
Section approved (12/14/06) continued use of Landfill No. 6 Area A West until next cell is active (Area D).  
Current Operations Manual approved on 02/27/08

### PURPOSE OF AUDIT:

Comprehensive

### STATUS OF PAST NOTED VIOLATIONS:

None

### AREAS OF CONCERN AND COMMENTS:

1. Permit #44-06 – Reviewed Permit and Operations Manual. Landfill is currently active in Area 6A West. Expect this area to be active until approximately 2/2011.
2. Weather conditions were sunny, dry, mid-80's. Overnight rain ~0.39 inches (according to on-site gauge).

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3. The landfill was maintained such that surface water runoff was controlled. No impoundment/ponding of water was visible over closed/inactive waste disposal areas. Erosion control measures were in place. Area C Lower was scheduled for mowing (Area C and B lower are proposed for the solar panel project).
4. Caps were maintained on inactive Areas. No erosion issues were noted and vegetation appeared stable. Landfill access road was gated, but unlocked during operational hours. Sign posted at gate with permit # and unacceptable wastes. Access roads were well-maintained.
5. Several inactive Areas of the facility are in use as hayfields (crop production). Understanding that this activity has been on-going for years, **please provide documentation** (if possible) regarding the Section approval of this activity.
6. During the audit, the recent Section policy regarding the requirement for waste boundary markers was discussed. It was communicated that the facility has choice in how they comply with this requirement and that the Section will be inspecting for visible (marker to marker) and maintained markers.
7. No windblown issues noted. Site accepts fly ash, lime waste, WWTF sludge, wood waste, and cinders. Top of active area was wet (recent rain) but very little ponding was observed.
8. Fire extinguishing equipment is located in all on-site vehicles. Most recent fire equipment check was on 6/30/09.
9. Leachate generated from the site is piped to the Town of Canton (owned by Evergreen Packaging/Blue Ridge Paper) Waste Water Treatment Facility (WWTF). Approximately 30,000-35,000 gallons per day are pumped to the WWTF. The leachate ponds were empty during the inspection (backup system). Evergreen conducts annual cleanouts of pond/pumps and periodic checks of the leachate pond liner system.
10. The facility accepts asbestos for disposal (generated from internal company activities only). This acceptance is not noted in either the permit or the Operations Manual. Specifically, the Operations Manual states (section 7.3) that the landfill "is licensed to dispose of wastes which fall into five general categories...fly ash, lime waste, WWTF sludge, wood waste, and cinders." It is recommended that the **facility update the Operation Manual** (during the next submittal period for the Area D expansion) **to reflect all current on-site disposal and waste management activities.**
11. The Areas which historically received asbestos were noted/signed and the active asbestos disposal area was marked, signed, and controlled in accordance with the Rules.
12. Groundwater monitoring records available and the two previous sampling events were reviewed. Groundwater monitoring wells will be inspected during future partial inspection.
13. Methane monitoring records were available. The Section recently, in 2008, added landfill gas monitoring (LFG) to the permit requirements. During review of the records it was noted that the consultant was monitoring ambient and "in-hole" locations around the perimeter of the property. Data was submitted as %Volume. It is recommended that the data be recorded (converted/collected) in %LEL (lower explosive limit) for ease of analysis. Additionally, permanent locations (methane wells) would generate more accurate LFG readings. It is recommended that a **LFG monitoring plan be submitted to the Section for approval, and that it be added to the next update of the Operation Manual.**

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14. The permit requires adherence to the 15A NCAC 13B .0503(2)(a) Rule which states *that the concentration of explosive gases generated by the site shall not exceed:*

(i) *twenty-five percent of the limit for the gases in site structures (excluding gas control or recovery system components).*

**Note that the Motor Control Room located by the leachate ponds should be put on the LFG monitoring plan to verify that the structure meets the above-stated requirements.**

15. The Evergreen/Blue Ridge Paper Products Inc. 10-Year Solid Waste Management Plan 3-Year Update was received at the Asheville Regional Office on June 15, 2009.

16. In general, the facility is well-maintained and operated, the records are in good condition, and the environmental controls are effectively managed.

Please contact me if you have any questions or concerns regarding this audit report.



Phone: (828) 296-4700.

Andrea Keller  
Environmental Senior Specialist  
***Regional Representative***

Mailed on : <u>07/08/09</u> by		Hand delivery		US Mail		Certified No. <u>  </u>
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cc: Mark Poindexter, Field Operations Branch Supervisor  
Deb Aja, Western District Supervisor  
Donald Herndon, Compliance Officer  
Christine Ritter, Permitting Hydrogeologist